

REMARKS

Claims 21-30, 32, 33, 35-38, 41, and 42 are pending in the application. Claims 21, 24, and 30 are amended herein. No new matter is added. Claims 21-30, 32, 33, 35-38, 41, and 42 are presented for examination.

Claim objections

Grammatical errors noted by Examiner are corrected herein.

Response to rejections under 35 USC 102:

Regarding independent claim 21: On page 4 of the office action, Examiner identifies in Eryurek a corresponding "first mechanism" (elements 900A-903A) and a "second mechanism" (element 914). Examiner then identifies in the first mechanism of Eryurek a corresponding second interface to the applications (col. 35, lines 56, 63 and col. 36, lines 10-13). However, these lines of Eryurek describe processors 914, which are the second mechanism, and are not part of the first mechanism (900A-903A), so the correspondence does not hold. In fact, the first and second mechanisms of Eryurek are remote from each other (FIGs 32 and 33).

The present amendment of claim 21 locates the first mechanism 6 of Applicant in the server 2, and the second mechanism 7 in the client 4. This is supported by FIGs 1 and 2 and paragraph 16, lines 16-26. This configuration allows the server 2 to manage the first mechanism 6 centrally, and limits the responsibility of each client 4 to local duties of linking applications to the automation devices 5. This configuration is reversed in Eryurek, in which the first mechanism 900A-903A is in the respective client plant 901-903, and the second mechanism 914 is in the server 910. Applicant's configuration is more efficient because the server 2 can control communications with the applications 3 centrally, where the applications 3 can be commonly supported, while the clients 4 are limited to interfacing with local automation devices 5 that are particular to each plant or client.

Response to rejections under 35 USC 103:

The above arguments apply to the independent claim 21 under 35 USC 103 as well, since the Examiner's proposed combination with East does not address the above correspondence issues.

Regarding independent claim 30: On page 12 of the office action, Examiner identifies in Eryurek a corresponding "second mechanism" (FIG 1, element 32), a "first mechanism" (FIG 1, element 50, and a communication channel (FIG 32, the connections between 902A-904A and 910)). Examiner then identifies in the first mechanism 50 of Eryurek a second interface 914 to the applications (col. 35, lines 56, 63 and col. 36, lines 10-13 and FIG 33, element 914). However, the first mechanism 50 of Eryurek is in the client plant (FIG 1), while the second interface 914 is in the remote server 910 (FIGs 32, 33), which is not part of the first mechanism 50. Thus the correspondence does not hold. In fact, the first mechanism 50 and the second interface 914 of Eryurek are remote from each other (FIGs 32 and 33).

The present amendment of claim 30 locates the first mechanism 6 of Applicant in the server 2, and the second mechanism 7 in the client 4, as supported by FIGs 1 and 2 and paragraph 16, lines 16-26. This configuration allows the server 2 to manage the first mechanism 6 centrally, and limits the responsibility of each client 4 to local duties of linking applications to the automation devices 5. According to Examiner's correspondence in claim 30, both the first and second mechanisms 50, 32 of Eryurek are in the client plant 10, 900-903, while the second interface 914 of the first mechanism is in a central server 910. Applicant's configuration is more efficient because the server 2 can control communications with the applications 3 centrally, where a single set of applications can be commonly supported, while the local clients 4 are limited to interfacing with local automation devices that are particular to each plant or client. The Examiner's proposed combination with East does not address the above correspondence issues.

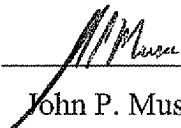
Conclusion

For anticipation to occur under 35 USC 102, every aspect of the claimed invention must be disclosed or implied in a single prior art reference. For obviousness to occur under 35 USC 103, any modification needed for anticipation must be suggested by the prior art, not by the Applicant's invention, it must work, and it must produce the Applicant's invention. These criteria are not met by the cited prior art, as argued above, because the cited references alone or in combination do not produce Applicant's invention as described, shown, and as claimed in the independent claims 21 and 30. The dependent claims should be allowable as depending from an allowable claim. Therefore the Applicant feels this amended application is in condition for allowance. Entry of this amendment, reconsideration, and allowance are respectfully requested.

The commissioner is hereby authorized to charge any appropriate fees due in connection with this paper, including the fees specified in 37 C.F.R. §§ 1.16 (c), 1.17(a)(1) and 1.20(d), or credit any overpayments to Deposit Account No. 19-2179.

Respectfully submitted,

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